1	Tim L. Eblen, OSB No.: 050252 EBLEN FREED PC		
2	1040 NE 44 <sup>th</sup> Ave., Ste. 4		
3	Portland, OR 97213 (503)548-6330		
4	<u>tim@eblenfreed.com</u> Of Attorneys for Sergey & Galina		
	Lebedenko		
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9		The Honorable Teresa H. Pearson	
10	UNITED STATES BANKRUPTCY COURT DISTRICT OF OREGON		
11	DISTRIC	I OF OREGON	
12	In re:	Case No. 22-31458-thp13	
13	AARON THOMAS SOULE	OBJECTION TO CONFIRMATION OF PLAN	
14	Debtor.	Confirmation Hearing	
15		Date: October 17, 2022 Time: 9:00 a.m.	
16		Place: Telephonic	
	COMES NOW Sorgay & Calina Laboda	Dulka (Craditar) by and through their atternay. Tim I	
17	COMES NOW, Sergey & Galina Lebedenko (Creditor), by and through their attorney, Tim L.		
18	Eblen, hereby object to Aaron Thomas Soule (Debtor) proposed Chapter 13 Plan dated September 20,		
19	2022 (Plan).		
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21	///		
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20			
	Objection to Confirmation of Plan Page - 1	Eblen Freed PC 1040 NE 44 <sup>th</sup> Ave. Suite 4 Portland, OR 97213 Tel: 503-548-6330 Fax 503-548-6333	

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## **OBJECTION**

Creditor and Debtor are currently in settlement negotiations. Debtor has represented that he will be filing an amended plan. Creditor reserves their right to further object to Debtor's plan, depending on the outcome of settlement negotiations.

WHEREFORE, Creditor, its successors and/or assigns, respectfully requests an Order denying Confirmation of Debtor's proposed Plan.

DATED this 11<sup>th</sup> day of October, 2022

/s/ Tim L. Eblen

Tim L. Eblen, OSB # 050252 Eblen Freed PC Attorney for Creditor 1040 NE 44<sup>th</sup> Ave, Suite 4 Portland, OR 97213 tim@eblenfreed.com P: 503-548-6330

Objection to Confirmation of Plan Page - 2

Eblen Freed PC 1040 NE 44<sup>th</sup> Ave. Suite 4 Portland, OR 97213 Tel: 503-548-6330 Fax 503-548-6333

1	<u>CERTIFICATE OF SERVICE</u>		
2			
3	I certify that on October 11 <sup>th</sup> , 2022, I served a copy of Objection to Confirmation of Plan, Unit States Bankruptcy Court District of Oregon, Case No.: 21-30882-pcm13 to the following partie		
4			
5	Ann K. Chapman 319 SW Washington #520	Wayne Godare 222 SW Columbia St., Ste. 1700	
6	Portland, OR 97201 Of Attorneys for Debtor	Portland, OR 97201 Bankruptcy Trustee	
7			
8	Via the ECF filing system and via US First Class Mail, postage pre-paid.		
9	The time Ber ming system and the estate man, pessage pro para-		
10		/a / Time I Elelon	
11		/s/ Tim L. Eblen Tim L. Eblen, OSB No.: 050252 Of Attorneys for Creditor	
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Certificate of Mailing Page - 3

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Eblen Freed PC 1040 NE 44<sup>th</sup> Ave. Suite 4 Portland, OR 97213 Tel: 503-548-6330 Fax 503-548-6333